

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

*In re Capital One Financial Corporation,
Affiliate Marketing Litigation*

Case No. 1:25-cv-00023-AJT-WBP

**CAPITAL ONE’S MOTION TO COMPEL DISCOVERY FROM FORMER
PLAINTIFFS**

Pursuant to Federal Rule of Civil Procedure 45, Defendants Capital One Financial Corporation, Wikibuy LLC, and Wikibuy Holdings, LLC—collectively referred to in this motion and the accompanying memorandum as “Capital One”—respectfully request that this Court order the 21 former plaintiffs to whom Capital One has issued subpoenas to provide the relevant, responsive documents requested therein, subject to the narrowing limitations described in the accompanying memorandum.

DATED: May 23, 2025

Respectfully submitted,

By: /s/ Connor Kelley

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2025, I caused the foregoing to be filed with the Clerk of the Court using the CM/ECF system, which will then send notification of such filing (NEF) to all counsel of record.

By: /s/ Connor Kelley
Connor Kelley